

EXHIBIT A

Subject: FWC - Challenge (5) to "Confidential" Designations
Date: Friday, August 18, 2023 at 12:05:14 PM Eastern Daylight Time
From: Corey Stern
To: Michael A. Olsen, Jim Campbell
CC: Melanie Daly, Ted Leopold, Jordan Connors, Steve Morrissey, Paul Novak, Hunter Shkolnik, Patrick Lanciotti, Hunter Shkolnik, Richard Kuhl, Margaret Bettenhausen, TMendel, Bill Kim, Sheldon Klein, Rick Berg, Wayne B. Mason, David C. Kent, Philip Erickson, Susan Smith, Brian MacDonald, Todd Weglarz, Donald Dawson, Michael L. Williams, Eric A. Rey, Alaina Devine, Kristin M. Dupre, Richard P. Campbell, Andreas Ringstad, Jack J. O'Donnell, John R. Penhallegon, Chris Muha, Christopher R. Howe, Christopher D. Fletcher, William C. Cahill, Kelly Kramer, Kristin Silverman, Mark Ter Molen, William Sinnott, Minh Olivier Nguyen-Dang, Chris Weld, Thompson, Craig S., travis.gamble@faegredrinker.com, vance.wittie@faegredrinker.com, Moshe S. Maimon, Jerome Block
Attachments: 2023.08.18 Letter to Veolia (5th Confidential Designations) [4].pdf

Counsel for Veolia:

Please find correspondence attached.

Best,

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August 18, 2023

VIA EMAIL & CERTIFIED MAIL (RRR)

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**RE: IN RE FLINT WATER CASES – PRODUCTION OF DOCUMENTS
CHALLENGE (5) TO “CONFIDENTIAL” DESIGNATIONS**

Mr. Campbell, Mr. Olsen:

Please be advised that pursuant to the Court's Confidentiality Order,¹ Plaintiffs hereby formally challenge the “Confidential” and “Highly Confidential – Attorneys' Eyes Only” designations of the following documents:²

1. VWNAOS002343
2. VWNAOS018579
3. VWNAOS014953-VWNAOS014954
4. VWNAOS042178-VWNAOS042190
5. VWNAOS0042190-VWNAOS042194
6. VWNAOS042195-VWNAOS042200
7. VWNAOS042201-VWNAOS042206
8. VWNAOS042207-VWNAOS042212
9. VWNAOS042250-VWNAOS042254
10. VWNAOS042519-VWNAOS042524
11. VWNAOS042525-VWNAOS042530
12. VWNAOS042559-VWNAOS042564

¹ See Case No. 16-cv-10444 (ECF. No. 1255-3).

² Some documents/groups of documents appear to be duplicative but were produced numerous times with varying Bates numbers.

13. VWNAOS255827-VWNAOS255836³
14. VWNAOS255837-VWNAOS255846⁴
15. VWNAOS255847-VWNAOS255857⁵
16. VWNAOS520031-VWNAOS521985
17. VWNAOS525459-VWNAOS525461
18. VWNAOS525515-VWNAOS525518
19. VWNAOS551521-VWNAOS551525
20. VWNAOS554030-VWNAOS554030.0003
21. VWNAOS554037-VWNAOS554037.0002
22. VWNASO554040-VWNASO554040.0002
23. VWNAOS563229-VWNAOS563237
24. VWNAOS225484-VWNAOS225502
25. VWNAOS255515⁶
26. VWNAOS321906
27. VWNAOS135456-VWNAOS135458
28. VWNAOS554020-VWNAOS554020.2132

These documents do not contain private, non-public, confidential, competitively sensitive, or proprietary information not readily ascertainable through lawful means by the public. Furthermore, if any of these documents were to be made public, such would not cause oppression, competitive disadvantage, infringement of privacy rights established by statute or regulation, or infringement of confidentiality requirements established by statute or regulation with respect to government purchasing or other operations.

This letter is a formal demand to withdraw all such designations **and to reproduce each document without any redactions**, whether noted herein or not.

Very Truly Yours,

LEVY KONIGSBERG, LLP


Corey M. Stern

³ Please reproduce without redactions.

⁴ Please produce without redactions.

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⁶ Please reproduce without redactions.

Cc: *(By email only)*
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All Veolia Entities' Counsel of Record or otherwise known